

Dimitry Kirsanov

Pro Se

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-10964 (MG)

) (Jointly Administered)
)
)

The Honorable Martin Glenn

Chief Bankruptcy Judge

United States Bankruptcy Court for the Southern District of New York

Alexander Hamilton U.S. Custom House

One Bowling Green New York, NY 10004

Re: Objection to Debtor's Motion in Limine to exclude Testimony of Oren Blonstein

Dear Chief Judge Glenn,

Mr. Kirsanov submits an objection to the debtor's motion in limine¹ to exclude certain evidence and testimony offered in opposition to confirmation, specifically regarding the Blonstein Declaration². The terms of the Plan have changed to adversely affect Mr. Kirsanov's

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

¹ <https://cases.stretto.com/public/x191/11749/PLEADINGS/1174910132380000000101.pdf> 3802

² <https://cases.stretto.com/public/x191/11749/PLEADINGS/1174912012280000000050.pdf> 1531

proposed recovery after balloting, as outlined on Mr Kirsanov's prior letter³ dated 10/11/2023.

Mr. Kirsanov. Mr Kirsanov alleges damages from the result of not being able to transfer his Celsius Token's ahead of the Bankruptcy and the Freeze, along with breach of settlement in the first Custody Settlement payout. The Blonstein Declaration had noted that the assets did not meet the liabilities in the CEL class ahead of the Freeze date.

Sincerely,

Dimitry Kirsanov, Pro Se

/s/Dimitry Kirsanov

³ <https://cases.stretto.com/public/x191/11749/PLEADINGS/1174910112380000000121.pdf> 3772

EXHIBIT A

SHOWN ON NEXT PAGE

MAX GALKA CROSS EXAMINATION REGARDING THE BLONSTEIN DECLARATION

212-267-6868

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www.veritext.com

516-608-2400

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<p>1 THE COURT: Was it in the original testimony or 2 this, the more recent supplemental declaration? 3 MR. KIRSANOV: I believe -- I'm not sure about 4 that, Your Honor. 5 MR. COLODNY: Your Honor, it's on Paragraph 61 6 (inaudible). 7 THE COURT: Of the original? 8 MR. COLODNY: The original. 9 THE COURT: Just give me a minute. 10 MR. COLODNY: (indiscernible). 11 THE COURT: Yes. Do you have your original report 12 in front of you, Paragraph 61? 13 THE WITNESS: Yes, I do. It's on Page 12. Go 14 ahead with your questions, Mr. Kirsanov. 15 BY MR. KIRSANOV: 16 Q Are you familiar with the Blonstein declaration, Mr. 17 Galka? 18 A No, I am not. 19 MR. KIRSANOV: Can Mr. Galka please be provided my 20 Exhibit 2? 21 THE COURT: Mr. Kirsanov -- 22 CLERK: Yeah, we could ask -- 23 THE COURT: If you'll wait, we'll see if we can 24 find it. You reference it on the first page of your filing, 25 Page 1 of 6. Exhibit 2 is ECF 1531, but we don't have all</p>	<p>1 courtroom, I don't know whether you can see it or not, is 2 exhibit -- the Blonstein declaration, ECF 1531. 3 MR. KIRSANOV: If you could scroll down to Page 8, 4 please. 5 BY MR. KIRSANOV: 6 Q Mr. Galka, is this document dated June 6th of 2022? 7 A Yeah, that that's the date that I see at the top of the 8 chart right there. 9 Q Was this before Celsius froze? 10 A Yes, it is. 11 Q In this document, are there adequate amounts of CEL 12 token under assets to meet the liabilities of Custody and 13 Withhold? 14 MR. WEEDMAN: Objection. 15 THE COURT: Sustained. 16 BY MR. KIRSANOV: 17 Q In this document, there are not an adequate number of 18 CEL tokens under assets to meet the liabilities of Custody 19 and the Withhold, are there? 20 MR. WEEDMAN: Objection, Your Honor. 21 THE COURT: Sustained. 22 BY MR. KIRSANOV: 23 Q Mr. Galka, how many CEL are shown there under assets? 24 A The number that I see there is -- appears to be 25 1,184,948. Although I would say that this is a document</p>
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<p>1 of these in the courtroom. Someone is trying to see whether 2 they can locate it. 3 MR. McCARRICK: Can we make Mr. Young a cohost? 4 THE COURT: Yes, you can. 5 CLERK: Just pull it up -- 6 MR. McCARRICK: And Mr. Young, if you could -- 7 CLERK: (indiscernible). 8 MR. McCARRICK: Thank you. 9 THE COURT: Deanna, you can make Mr. Young a 10 cohost. We'll put it up on the screen. 11 CLERK: Okay. 12 THE COURT: Thank you very much. 13 CLERK: Just one moment. 14 MR. KIRSANOV: Thank you. 15 CLERK: Okay, he is a cohost. 16 MR. McCARRICK: Okay. Mr. Young, could you 17 display Docket No. 1531? 18 MR. YOUNG: 1531? 19 MR. McCARRICK: Yes, sir. 20 MR. YOUNG: -- second. 21 THE COURT: Sure. Fine. 22 MR. McCARRICK: Apologies for the delay. It 23 should be shared on screen now. 24 MR. KIRSANOV: Thank you. 25 THE COURT: All right, so on the screen in the</p>	<p>1 that I have not seen before, so I'm just reading what is -- 2 what I see appearing on the screen. 3 Q Thank you, Mr. Galka. Could you tell me what it says 4 under liabilities for CEL and under Withhold for CEL? 5 A Yeah, liabilities I see negative one million, nine 6 hundred -- or excuse me, ninety-seven thousand, one, seven, 7 four, and Withhold, I see 402,804. 8 Q Mr. Galka, does -- do the assets reflect lower than 9 the liabilities? 10 MR. WEEDMAN: Objection, Your Honor. 11 THE COURT: Sustained. 12 BY MR. KIRSANOV: 13 Q Mr. Galka, would it be safe to say the liabilities are 14 1.5 million or thereabouts? 15 MR. WEEDMAN: Objection, Your Honor. 16 THE COURT: Sustained. I don't -- you know, I 17 don't understand what you're asking. 18 MR. KIRSANOV: I'm trying to ask if effectively 19 the assets held were less than the liabilities. 20 MR. WEEDMAN: Your Honor -- 21 THE COURT: First off, this document is not in 22 evidence. That's number one. I'm permitting you to cross 23 examine from it. Have you seen this document before? 24 THE WITNESS: No, I have not, Your Honor. 25 THE COURT: Let's move on. The document is not in</p>